

Oak Ridge Environmental Peace Alliance
Oak Ridge, TN
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Peace Alliance ("OREPA") on behalf of its more than 1700 members. These comments reflect the concerns of the membership of OREPA in general and are not meant to preclude or supercede the particular comments of any individual member of OREPA.

OREPA is a non-profit corporation chartered by the state of Tennessee. The primary purpose of OREPA is to educate the public about the activities of DOE on the Oak Ridge Reservation, in particular activities related to nuclear weapons production, environmental protection, and worker and public health and safety. OREPA has performed its function as a public interest group since 1988; members of OREPA have served on officials advisory bodies of the State of Tennessee and the Environmental Protection Agency addressing the issues that are central to the work of OREPA.

Hundreds of the members of OREPA live and work within twenty miles of the Y-12 Nuclear Weapons Plant in Oak Ridge, Tennessee. OREPA's offices are located two and a half miles from the Y-12 National Security Complex (as it was re-named in November 2000). Children of OREPA members attend schools located less than two miles from the Y-12 Plant.

Many OREPA members are directly impacted by decisions made and activities undertaken at the Y-12 Plant. They have suffered or will suffer environmental or physical harm caused by potential contamination of their local water and air supplies, by the release of contaminants from the proposed activities at Y-12, and from potential accidents postulated as risk scenarios in the EIS, including explosions, fire, chemical releases, nuclear criticality accidents, and natural phenomena (flood, fire, tornado and earthquake). The impacts to the environment contemplated in the Y-12 EIS are directly traceable to the activities of DOE. OREPA members, by virtue of their proximity to the Y-12 site, will, at a minimum, be directly affected by the potential generation and release of hazardous and or radioactive materials into the environment in and around the Oak Ridge Reservation.

OREPA believes that the Y-12 EIS in its Draft form fails to provide adequate information to the public to allow full and meaningful engagement of the issues examined in the EIS. OREPA further believes that it has a responsibility, based on its purpose—to protect the health of its members and the public and to protect the environment through the dissemination of information—to insist that DOE prepare an adequate Environmental Impact Statement. The Department of Energy has a responsibility in preparing an Environmental Impact Statement to "provide information that a concerned citizen might want." (*Recommendations for the preparation of Environmental Assessments and Environmental Impact Statements*, DOE Office of NEPA Oversight, May 1993). These comments will identify areas where DOE has failed to comply with its own guidance.

THE Y-12 NATIONAL SECURITY COMPLEX (Y-12 PLANT)

In November 2000 the historic Y-12 Plant in Oak Ridge was renamed the Y-12 National Security Complex. More than 200 buildings make up the heavy industrial infrastructure of Y-12; they are spread across approximately 800 acres. (The entire Y-12 site is 3,600 acres.)

Since its founding as a part of the Manhattan Project, when it enriched the uranium which eventually became the Little Boy bomb, Y-12 has been instrumental in the development and production of every nuclear weapon in the US arsenal. Y-12 contributions to the nation's nuclear stockpile included production of radioactive materials for bombs, production of hazardous chemical components for bombs, and machining and manufacturing of other components for the bombs.

The centerpiece of the Y-12 nuclear weapons production mission has been to produce the Canned Sub-Assembly ("CSA"), also called the "secondary," of the nuclear weapons physics package. The secondary is the part which makes an atomic bomb (like the ones which destroyed Hiroshima and Nagasaki) into a thermonuclear bomb, thousands of times more destructive.

Y-12 also has two other missions central to the nuclear weapons arsenal. One is to disassemble and dismantle retired nuclear weapons components (particularly the

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NEPA analyses would be conducted at that point. Sections 1.1.3 and 3.3 discuss the Y-12 Modernization Program. DOE has made every effort to ensure that the preparation of the SWEIS has involved the public and interested stakeholders. DOE has encouraged public participation in the process beginning with the initial scoping meetings and continuing with public hearings and the comment period for the Draft Y-12 SWEIS. Furthermore, DOE has consulted with a number of other Federal and state agencies during its preparation of the Y-12 SWEIS. The SWEIS also has been reviewed by other state and Federal agencies.

Segmentation involves separately analyzing connected and cumulative actions in order to reduce the significance of the environmental impacts of an action as a whole. CEQs regulations are directed at avoiding improper segmentation, and the Y-12 was prepared in accordance with CEQ regulations. The proposed action and alternatives in the Y-12 SWEIS are independent of other potential future modernization actions at Y-12. Any future proposals would be the subject of separate NEPA reviews if and when it is decided to move forward with specific actions.

The commentor's reference to Building 9201-4 being planned for demolition by EM has been changed in the Final SWEIS. Current planning by EM is to accomplish the D&D of the Lithium Colex Process and convert the building to warehouse status for future use. This action would remove all the process and process support system equipment, piping and electrical components, and leave the live utilities and the structure intact. The project has not been reviewed or approved by DOE headquarters and has not been submitted for planning budgets. In 1999, the estimated schedule for starting D&D was 2006, with completion in 2007. Implementation of this D&D activity is becoming more speculative over time, especially with reduced funding for EM activities at ORR. In any case, the activity would be within Building 9201-4 and not have a significant environmental impact.

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